

Executive Summary - Environmental Compliance Audit Cook Composites and Polymers Co. (CCP) – Saukville

An environmental compliance audit was conducted for the Cook Composites and Polymers Co. (CCP) – Saukville plant on October 14, 2003 by Kestrel Management Services, LLC. The audit covered the following regulatory areas: air, solid and hazardous waste, oil pollution prevention, wastewater (including storm water), PCB management, the Emergency Planning and Community Right to Know Act, the Toxic Substances Control Act (for issues associated with chemical manufacturing and importing), underground storage tanks, universal waste, used oil, and drinking water.

There were no applicable issues associated with PCB management, underground storage tanks and drinking water at the plant.

Considering the wide range of environmental management and regulatory requirements associated with the operation of this facility, relatively few issues were observed during the audit. Most have been corrected, either at the time of the audit or within a short time thereafter. A few open items remain as listed below, with corrective actions planned or underway. None of the items is considered to pose a significant risk to the environment, plant personnel or surrounding community.

On-going regulatory compliance and continual improvement of environmental performance are being addressed by the plant through the implementation of its Environmental Management System (EMS) component of CCP's Atofina Integrated Management System (AIMS) project.

Air

Technology Controls

- As part of the facility EMS, emission control consistent with or equivalent to RACT requirements should continue to be evaluated for the plate-and-frame filter press. Pollution prevention approaches should be considered for vessels that are periodically opened.

Administrative Controls

- Review applicability and implement and periodically audit measures to meet RACT requirements for cold cleaners, such as appropriate labeling and keeping lids closed when not in use.
- Return to quarterly reports to the WDNR documenting all inspections for detectable leaks of volatile organic compounds, even when no detectable leaks have been found, and document any repairs. CCP had decreased frequency as allowed by WDNR regulations based on their historic monitoring. However, plant modifications have added new monitoring points. The quarterly frequency should be maintained until new emission points demonstrate appropriate statistical conformance.
- Determine whether the facility needs to develop an air pollution episode program – the WDNR has never required any source to actually use its air pollution episode program, and air pollution episodes are quite rare, last occurring in 1988.

Hazardous Waste

Administrative Controls

- Improve practices to ensure that no more than 90 days elapse before waste is removed from the storage tank (only two occurrences were noted over the past two years).
- Improve management of personnel training records at the plant to ensure they include all applicable information. These records have been stored at the corporate Quality, Safety and Environment (QSE) office in Kansas City, MO.
- Ensure and document that copies of the Contingency Plan have been made available to local emergency authorities (fire department, etc.)
- Ensure that all individuals who sometimes sign manifests receive training on how to fill out manifests (The audit did not find training records showing that two individuals who have signed manifests were trained, although most manifest documentation was excellent).
- Copies of land disposal restriction certification/notification forms for some shipments to Missouri and Wisconsin cement kilns could not be found in the manifest documentation file.

Universal Waste

The only universal waste generated at the facility that was observed was a small number of spent fluorescent lamps. Improve the storage, labeling and dating of containers for universal wastes (spent fluorescent lamps) and awareness of requirements by the persons responsible for managing the spent lamps.

Oil Pollution Prevention

- Consider secondary containment for the 500-gallon diesel fuel tank, associated with the fire fighting system. It is currently located outside the poly-drain containment system. As an alternative, consider relocating to an area inside the poly-drain containment system.
- Revise the Spill Prevention, Control and Countermeasure (SPCC) Plan to make it more comprehensive and detailed. Ensure that the revised plan is certified by a Professional Engineer (P.E.).

Emergency Planning and Community Right to Know Act (EPCRA)

- The facility has been annually notifying the State Emergency Response Commission that extremely hazardous substances above threshold amounts are on-site through its Tier II form submissions, as required. However, the original notification (pre-CCP) to the Commission was not found in facility files.
- Establish a formal audit function to ensure the applicable agencies receive information about the location and retention of Material Safety Data Sheets for substances present at the facility above threshold reporting amounts.
- Improve and prioritize procedures for responding to potential releases of the higher risk substances covered by EPCRA. Use the AIMS area risk assessment process to focus the procedures by plant area.